

# HARKINS CUNNINGHAM LLP

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September 21, 2011

## **BY E-FILEING**

Cynthia T. Brown  
Chief, Section of Administration  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423-0001

230984

**Re: Manufacturers Railway Company – Discontinuance Exemption – In  
St. Louis, MO., Docket No. AB-1075X**

Dear Ms. Brown:

On July 27, 2011 Manufacturers Railroad Company (“MRS”) petitioned for a partial stay pending judicial review of the Surface Transportation Board’s July 12, 2011 decision in the above-captioned proceeding, authorizing MRS to discontinue service over its entire system subject to the employee protective conditions set forth in Oregon Short Line. On August 10, 2011, the Board issued a 45 day “housekeeping stay” to fully consider the issues presented in MRS’s stay petition. Because it stayed the effective date of the decision, MRS is unable to discontinue service while the housekeeping stay is in effect.

MRS has now determined the relief sought by the July 27 stay petition is not necessary and hereby withdraws that petition. MRS has entered into agreements with the affected employees which obviate the need for relief sought in the July 27 stay petition. We are simultaneously filing a notice of withdrawal of the motion to stay filed with the court of appeals on August 30. MRS therefore respectfully requests the Board vacate the housekeeping stay as soon as possible to allow MRS to discontinue service.

Please let me know if you have any questions about this filing.

Office of: SEP 21 2011

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Very truly yours,

  
Paul A. Cunningham  
Counsel for Manufacturers Railway Company

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cc: All parties of record